

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

FOREMOST SIGNATURE INSURANCE
COMPANY, a Michigan corporation duly
licensed to sell and administer insurance
in The State of Nevada,

Plaintiff,

v.

GMUENDER ENGINEERING, LLC, a
Nevada limited liability company; JOSEF
C. GMUENDER and JANE DOE
GMUENDER, husband and wife; MARY E.
GMUENDER and JOHN DOE MUENDER,
husband and wife; WILLIAM HUBER,
parent and guardian of Ashley Huber and
Taylor Huber, individually and as surviving
children of Kelly Huber, deceased;
GRANBY REALTY HOLDINGS, LLC, a
Colorado limited liability company;
GRANITE STATE INSURANCE
COMPANY, an Illinois corporation;
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH PA, a
Pennsylvania corporation,

Defendants.

Case No. 3:19-cv-00508-MMD-CLB

ORDER APPROVING

STIPULATION FOR EXTENSION
OF TIME TO FILE RESPONSE TO
JOINT MOTION FOR ENTRY OF
STIPULATED JUDGMENT [ECF 25]

(First Request)

1 Defendants/Counterclaim and Cross-Claim Plaintiffs, GRANITE STATE
 2 INSURANCE COMPANY ("Granite State") and NATIONAL UNION FIRE INSURANCE
 3 COMPANY OF PITTSBURGH, Pa. ("National Union"), by and through its attorneys of
 4 record, NICOLAIDES FINK THORPE MICHAELIDES SULLIVAN LLP,
 5 Plaintiff/Counterclaim Defendant, FOREMOST SIGNATURE INSURANCE COMPANY
 6 ("Foremost"), by and through its counsel of record, CHRISTIAN, KRAVITZ, DICHTER,
 7 JOHNSON & SLUGA, LLC, and Defendants/Cross-Claim Defendants, Gmuender
 8 Engineering, LLC and Josef C. Gmuender (the "Gmuender Defendants"), by and
 9 through its attorneys of record, Lauria Tokunaga Gates & Linn, LLP, hereby stipulate
 10 and agree to extend the deadline for Granite State and National Union to file a
 11 response to Foremost's and the Gmuender Defendants' "Joint Motion for Entry of a
 12 Stipulated Judgment Against Gmuender Engineering, LLC and Josef C. Gmuender"
 13 (ECF 25)("the Joint Motion") to and including May 12, 2020.

14 This stipulation is submitted in compliance with LR IA 6-1. Good cause exists for
 15 the requested extension as Granite State, National Union, and their counsel are all in
 16 remote protocols due to effective Covid 19 requirements at their normal places of
 17 business. Due to remote work protocols, additional time for attorney-client
 18 consultation and analysis of the response to the Joint Motion is required. The Parties
 19 to this stipulation agree that additional time is needed to fully evaluate and respond to
 20 the issues presented by the Joint Motion.

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1 This is the parties' first request for an extension of the response deadline to the
2 Joint Motion.

3 Dated: April 16, 2020

NICOLAIDES FINK THORPE
MICHAELIDES SULLIVAN LLP

5 By: /s/ Jeffrey N. Labovitch
Jeffrey N. Labovitch
Nevada Bar No. 10915
4365 Executive Drive, Suite 950
San Diego, CA 92121
6 *Attorney for Defendants/Counterclaim and*
7 *Cross-Claim Plaintiffs Granite State*
8 *Insurance Company and National Union*
9 *Fire Insurance Company of Pittsburgh, Pa.*

10 Dated: April 16, 2020

CHRISTIAN, KRAVITZ, DICHTER,
JOHNSON & SLUGA, LLC

12 By: /s/ Gena L. Sluga
Gena L. Sluga
Nevada Bar No. 9910
8985 South Eastern Avenue, Suite 200
Las Vegas, NV 89123
13 *Attorney for Plaintiff/Counterclaim*
14 *Defendant Foremost Signature Insurance*
15 *Company*

16 Dated: April 16, 2020


LAURIA TOKUNAGA GATES & LINN, LLP

18 By: /s/ Mark Tokunaga
Mark Tokunaga
885 Tahoe Blvd., Suite 7
Incline Village, NV 89451
19 *Attorney for Defendants/Cross-claim*
20 *Defendants Gmuender Engineering, LLC*
21 *and Josef C. Gmuender*

22 **ORDER**

23 **GOOD CAUSE SHOWN, IT IS SO ORDERED.**

24 Dated this 17th day of April, 2020.

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28 MIRANDA M. DU.
CHIEF UNITED STATES DISTRICT
JUDGE